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May 18, 2020

BY ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *In re Customs and Tax Administration of the Kingdom of Denmark
(Skatteforvaltningen) Tax Refund Scheme Litigation, 18-md-2865 (LAK)*

Dear Judge Kaplan:

We write on behalf of Plaintiff Skatteforvaltningen (“SKAT”) to request leave to submit a letter reply of no more than two pages in further support of SKAT’s motion [No. 18-md-02865, ECF No. 335] to compel ED&F Man Capital Markets, Ltd. (“ED&F”) to produce documents.

In its reply, SKAT would address the following issues raised in ED&F’s opposition [ECF No. 337] to SKAT’s motion:

- the timing of ED&F’s application to the English court relative to the timing of SKAT’s pending motion before this Court;
- the application of English law to the issues raised in the motion; and
- ED&F’s claim that SKAT “is putting the cart before the horse,” while ED&F keeps the horse hidden in the barn.

Should the Court grant SKAT leave to file such a reply letter, SKAT will file the reply within one business day of the Court’s Order.

Respectfully submitted,

/s/ Marc A. Weinstein
Marc A. Weinstein

Cc: All counsel of record (via ECF)